

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

UNITED STATES OF AMERICA)
)
 v.)
)
 GEORGE SCHUSSEL,)
 Defendant)

2005 MAR -4 P 4: 35

CRIMINAL NO. 04-10060-RCL
U.S. DISTRICT COURT
DISTRICT OF MASS

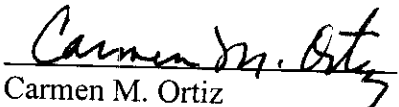
ASSENTED-TO MOTION TO SEAL

The United States of America, with the assent of the Defendant, hereby moves this Honorable Court to issue an order maintaining under seal the Government's Response to Defendant's Reply to Opposition to Defendant's Motion to Suppress Evidence on Claim of Privilege and accompanying affidavit of Edward DeFranceschi and other exhibits, which are attached hereto and filed today by the government. As grounds for this motion to seal, the government states that the attached response contains substantial detail relating to the crime-fraud exception and attorney-client communications, in response to defendant's reply brief. To prevent any disclosure of information potentially privileged as contained in these materials, the government requests that this Honorable Court maintain the attached documents under seal.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:


Carmen M. Ortiz
Assistant U.S. Attorney